

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION
BUREAU, et al.,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC) et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

MOTION ON BEHALF OF:

Defendant Richard K. Gustafson II
by and through his attorneys,
CONNORS LLP.

**DATE, TIME, AND PLACE
OF MOTION:**

To be determined by this Court, before
the Hon. Michael J. Roemer, United
States District Court Judge, Robert H.
Jackson United States Courthouse, 2
Niagara Square, Buffalo, New York
14202.

Oral argument is requested.

RELIEF REQUESTED:

An Order of this Court dismissing the
Second Amended Complaint against
Defendant Richard K. Gustafson II,
together with such other and further
relief as this Court deems just and
proper.

**GROUND FOR
RELIEF REQUESTED:**

Fed.R.Civ.P. 12(b)(6)

SUPPORTING PAPERS:

Memorandum of law in Support,
together with all prior pleadings and
proceedings

Movant intends to submit reply papers.

DATED: Buffalo, New York
October 14, 2024

/s/ Terrence M. Connors

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TO: All Parties of Record (via CM/ECF)